

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, Inc., et al.,

Post-Effective Date Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**RE: D.I. 1839**

**CERTIFICATION OF COUNSEL REGARDING GUC TRUST’S THIRD OMNIBUS  
(NON-SUBSTANTIVE) OBJECTION TO CERTAIN CLAIMS (LATE FILED CLAIMS)**

The undersigned counsel for the JOANN Liquidating Trust (the “GUC Trust”) in the above-captioned cases hereby certifies that:

1. On November 11, 2025, the GUC Trust, by and through Steven Balasiano, solely in his capacity as the trustee of the GUC Trust, filed the *GUC Trust’s Third Omnibus (Non-substantive) Objection to Certain Claims (Late Filed Claims)* [D.I. 1839] (the “Objection”), by which the GUC Trust sought entry of the proposed order attached thereto (the “Proposed Order”) disallowing and expunging certain late filed claims.

2. Pursuant to the *Notice of GUC Trust’s Third Omnibus (Non-substantive) Objection to Certain Claims (Late Filed Claims)* [D.I. 1839-3], responses to the Objection were required to have been filed with the Court and served no later than December 3, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

3. Prior to the Objection Deadline, claimants EQYInvest Owner II, LTD, LLP filed the *Response Of EQYInvest Owner II, Ltd, LLP to GUC Trusts’s Third Omnibus Objection To Certain Claims (Late Filed Claims) Relating To Landlord’s Claim Number 17866* [D.I. 1850];

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<sup>1</sup> The Post-Effective Date Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

Decorware Inc. filed the *Response to Objection to Claim* [D.I. 1857]; Hero Arts Rubber Stamps Inc. filed the *Response to Objection to Claim No. 12400* [D.I. 1858]; and Aurient International Corp. filed the *Response to Objection of Claim* [D.I. 1865] (the “Formal Responses”).

4. Additionally, prior to the Objection Deadline, the GUC Trust received informal comments to the Proposed Order (the “Informal Responses,” and together with the Formal Responses, the “Responses”) from counsel to claimants Acacia-Tucson LLC and NNN Yulee FL Owner LP.

5. The GUC Trust has revised the Proposed Order (the “Revised Proposed Order”) to resolve the Responses. The Revised Proposed Order is attached hereto as **Exhibit 1**.

6. The resolutions reflected in the Revised Proposed Order have been shared with counsel for the parties that submitted the Responses, and those parties have confirmed their agreement to those resolutions. For the convenience of the Court and all parties in interest, a redline of the Revised Proposed Order, showing changes made from the Proposed Order, is attached hereto as **Exhibit 2**.

*[Remainder of page intentionally blank]*

WHEREFORE, the GUC Trust respectfully request that the Revised Proposed Order be entered at the earliest convenience of the Court.

Dated: December 11, 2025

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

/s/ Steven L. Walsh

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